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8 Attorneys for Defendant

9 UNITED STATES DISTRICT COURT  
10 NORTHERN DISTRICT OF CALIFORNIA  
11 SAN FRANCISCO DIVISION

|                                     |   |                                 |
|-------------------------------------|---|---------------------------------|
| 12 GERALDINE MCWEENEY,              | } |                                 |
| 13 Plaintiff,                       |   | CIVIL NO. 05-01989 BZ CRB       |
| 14 v.                               |   | STIPULATION AND ORDER EXTENDING |
| 15 JO ANNE B. BARNHART,             |   | DEFENDANT'S TIME TO FILE        |
| 16 Commissioner of Social Security, |   | RESPONSE TO PLAINTIFF'S         |
| 17 Defendant.                       | } | MOTION FOR SUMMARY JUDGMENT     |

18 IT IS HEREBY STIPULATED by and between the undersigned attorneys, subject to the  
19 approval of the Court, that defendant Commissioner may have an extension of 30 days in which to  
20 file her response to plaintiff's motion for summary judgment.<sup>1</sup> Defendant's response was due on  
21 March 24, 2006, pursuant to Civil L.R.16-5. Defendant's response is now due on April 24, 2006.

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<sup>1</sup> See attached Declaration of Deborah Lee Stachel.

1 This is defendant's first request.  
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5 Dated: March 14, 2006

/s/  
JESSE KAPLAN  
Attorney for Plaintiff

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8 KEVIN V. RYAN  
United States Attorney  
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12 Dated: March 15, 2006

By: /s/  
SARA WINSLOW  
Assistant United States Attorney  
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15 PURSUANT TO STIPULATION, IT IS SO ORDERED:  
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19 Dated: March 16, 2006

~~BERNARD ZIMMERMAN~~ CHARLES R. BREYER  
United States Magistrate Judge  
District  
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Attorneys for Defendant

8 UNITED STATES DISTRICT COURT  
9  
10 NORTHERN DISTRICT OF CALIFORNIA

11 GERALDINE McWEENEY,  
12 Plaintiff,

13 v.

14 JO ANNE B. BARNHART,  
15 Commissioner of Social Security,  
16 Defendant.  
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CIVIL NO. C-05-01989 CRB

DECLARATION IN SUPPORT OF  
DEFENDANT'S REQUEST FOR  
EXTENSION OF TIME

18  
19 I, Deborah Lee Stachel, declare and state as follows:  
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21 1. I am an Assistant Regional Counsel in the Office of the General Counsel for the United  
22 States Social Security Administration, Region IX.

23 2. I am requesting a 30-day extension for filing Defendant Commissioner's response to  
24 Plaintiff's motion for summary judgment in order to provide further opportunity for review and analysis  
25 of this case.  
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1 I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

2 Executed in San Francisco, California on March 13, 2006.

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5 By /s/  
6 Deborah Lee Stachel  
7 Assistant Regional Counsel  
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